

# EXHIBIT C

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
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This document relates to:

*Matthew Rowenhorst, et al. v. Islamic Republic of Iran (1:18-cv-12387) (GBD) (SN)*

**DECLARATION OF FAMILIAL RELATIONSHIP**

I, Constance Muldowney, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Constance Muldowney, and I am the wife of Richard Thomas Muldowney, Jr., who died on September 11, 2001 when the World Trade Center collapsed. I submit this Declaration for the purpose of demonstrating that Richard Thomas Muldowney, Jr. was the functional equivalent of my children's, John and Kathryn Emma Proodian, father.

2. While John and Kathryn Proodian were not Richard Thomas Muldowney, Jr.'s biological children, for the reasons set forth in John and Kathryn Proodian's respective Declaration of Familial Relationship and below, John and Kathryn Proodian should be deemed the functional equivalent of his biological children.

3. In 1992, I separated from John and Kathryn Proodian's biological father and in 1994 we were divorced.

4. The same year, Richard Thomas Muldowney, Jr., came into my life and we began dating. Kathryn and John were 3 and 4 years old at the time, respectively.

5. Before I married Rich, he would travel significantly between Florida where we lived and New York where he worked as a firefighter with Ladder Co. 7 in Manhattan.

See Exhibit 1. He always stayed with us and he would come to Florida about every six weeks or so until we all relocated from Florida to New York to live together in 1998.

6. On June 28, 1998, Rich and I were married and, along with John and Kathryn, we became a family. See Exhibit 2.

7. The same year we were married, John and Kathryn's biological father passed away.

8. John and Kathryn always considered their stepdad as a real father in their lives, especially after their biological father passed away.

9. As a firefighter, Rich worked hard to provide for his stepchildren and me. He was the financial support in my family, particularly since we did not receive child support from John and Kathryn's biological father. While I did work before we were married, since I did not receive any financial support from their biological father, Rich helped financially support John and Kathryn. After we were married, Rich and I filed joint tax returns claiming both John and Kathryn as dependents.

10. In addition to this financial support, he treated John and Kathryn like his own children, emotionally and socially. He would give them advice (and, of course, discipline) like any loving father and as to the outside world, there was no question that John and Kathryn were his children.

11. His whole side of the family treated John and Kathryn that way as well. To this day, they considered John and Kathryn his children and they affectionately call Rich's mother "Mamma" along with her other grandchildren. John and Kathryn's children, along with the other great-grandchildren, call Rich's mother "Gigi."

12. John and Kathryn were very close to Rich. Rich taught him how to play baseball. He helped Kathryn ride horses and play softball. He came into their lives when they were very young and was an important influence in their young formative years.

13. Other favorite memories include Rich taking John and Kathryn fishing and crabbing near our house in Long Island being out on the fishing boats from the Captree fleet or friends' boats, and taking family vacations, taking long bike rides, and Rich coaching John's Little League games and Kathryn's softball games. He was always very active in their lives. They really enjoyed having bonding time with him every year for the drill tournaments Rich helped set up as a Volunteer firefighter in Freeport, Long Island. *See Exhibit 3.*

14. On September 11, 2001, our family was forever changed.

15. Kathryn was 9 years old and John was 11 years old and we were all living together with Rich in New York on September 11, 2001.

16. After finding out Rich was one of the missing victims, John and Kathryn were distraught and hoped for a long time that he would be found. When reality set in that their stepdad was never coming back, they took it very hard. They both missed having his fatherly voice and know that it would have guided them through my childhood and now.

17. They were fortunate to be involved in the FDNY's America's Camp for children of 9/11 victims. They went to the camp every summer as children and young adults. It was good for John and Kathryn to spend time with other children of 9/11 victims who were going through the same loss as them.

18. In sum, Richard Thomas Muldowney, Jr., their stepdad, was very much a father in their lives and they considered each-other to be father and son and daughter in every way. *See Exhibit 4.*

19. He was in their lives for most of their young lives when he passed away and we will always miss him with fond memories. *See* Exhibit 5.

*[intentionally left blank]*

Executed on: 8/13/19

Name (Signature):

Constance Muldowney

Name (Print):

CONSTANCE MULDOWNEY

# EXHIBIT 1





# **EXHIBIT 2**















# **EXHIBIT 3**















**SPLASH MOUNTAIN**  
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# **EXHIBIT 4**









# **EXHIBIT 5**















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